

Francis O. Scarpulla (41059)  
 Craig C. Corbitt (83251)  
 Judith A. Zahid (215418)  
 Patrick B. Clayton (240191)  
 Qianwei Fu (242669)  
 Heather T. Rankie (268002)  
 ZELLE HOFMANN VOELBEL & MASON LLP  
 44 Montgomery Street, Suite 3400  
 San Francisco, CA 94104  
 Telephone: (415) 693-0700  
 Facsimile: (415) 693-0770  
*fscarpulla@zelle.com*

Joseph M. Alioto (42680)  
 Theresa D. Moore (99978)  
 ALIOTO LAW FIRM  
 225 Bush Street, 16th Floor  
 San Francisco, CA 94104  
 Telephone: (415) 434-8900  
 Facsimile: (415) 434-9200  
*jmalimoto@aliotolaw.com*

*Co-Lead Class Counsel for Indirect-Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE TFT-LCD (FLAT PANEL)  
 ANTITRUST LITIGATION

Case No. 3:07-MD-1827 SI  
 MDL No. 1827

This Document Relates to:

All Indirect-Purchaser Actions;

*State of Missouri, et al. v. AU Optronics Corporation, et al.*, Case No. 10-cv-3619;

*State of Florida v. AU Optronics Corporation, et al.*, Case No. 10-cv-3517; and

*State of New York v. AU Optronics Corporation, et al.*, Case No. 11-cv-0711.

**~~PROPOSED~~ ORDER RE:  
 DISTRIBUTION FROM ESCROW  
 FUNDS FOR CLAIMS  
 ADMINISTRATION**

The Honorable Susan Illston

1 WHEREAS, on December 27, 2011, the Court granted final approval to settlements  
 2 between the Indirect-Purchaser Plaintiffs (“IPPs”) and the States of Arkansas, California,  
 3 Florida, Michigan, Missouri, New York, West Virginia, and Wisconsin (“Settling States”) on the  
 4 one hand, and defendants Chimei, Chunghwa, Epson, HannStar, Hitachi, Samsung and Sharp, as  
 5 identified in the respective Settlement Agreements, and inclusive of related entities also  
 6 identified in the respective Settlement Agreements (collectively, “Group-I Settling Defendants”),  
 7 on the other hand; and

8 WHEREAS, on July 30, 2012, the Court granted preliminary approval to the settlements  
 9 between IPPs and the Settling States, and defendants AUO, LG and Toshiba, as identified in the  
 10 respective Settlement Agreements (collectively, “Group-II Settling Defendants” and with the  
 11 Group-I Settling Defendants referred to hereafter as “All Settling Defendants”), on the other  
 12 hand; and

13 WHEREAS, the Settlement Agreements with All Settling Defendants provide that the  
 14 costs of administration of the claims process shall be paid from the Settlement Fund of each  
 15 Settling Defendant, *pro rata*, based on each Settling Defendant’s Settlement Amount; and

16 WHEREAS, the cost of claims administration invoiced by Rust Consulting is  
 17 \$152,081.09 (see Exhibit 1 attached hereto); and

18 WHEREAS, pursuant to the Settlement Agreements the following amounts may be  
 19 deducted from each Settling Defendant’s Settlement Fund to pay such costs of claims  
 20 administration:

21	Chimei	\$15,498.73
22	Chunghwa	\$745.62
23	Epson	\$400.56
24	HannStar	\$3,605.06
25	Hitachi	\$5,478.18
26	Samsung	\$33,731.60
27	Sharp	\$16,233.33
28	AUO	\$22,698.55

1 LG \$50,737.95

2 Toshiba \$2,951.51

3 **TOTAL \$152,081.09**

4 WHEREAS, Well Fargo Bank, N.A. has informed the parties that it requires an order  
5 from the Court before it will distribute payment for these additional costs;

6 THEREFORE, IT IS HEREBY ORDERED that Wells Fargo Bank, N.A. shall wire  
7 **\$152,081.09** to the following account:

8 Bank of Texas

9 ABA/Routing # 111014325

10 Account # 8093434387

11 Account Name: Rust Consulting

12 Reference # 128325

13 Federal Tax ID # 41-1813634

14 Bank Contact: Mayra Landeros, (214) 987-8817

15 The balance of funds in the demand-deposit account, if any, shall be retained for  
16 additional costs as they are incurred.

17  
18 **IT IS SO ORDERED.**



19  
20 Dated: 7/25/13, 2013

21 Hon. Susan Illston  
22 United States District Judge

23  
24  
25  
26  
27 3246137v1  
28

# EXHIBIT 1



# Invoice

625 MARQUETTE AVENUE, SUITE 880  
MINNEAPOLIS, MN 55402  
P 612.359.2000 | F 612.359.2050  
WWW.RUSTCONSULTING.COM  
FEDERAL ID #: 41-1813634

DATE: 05/13/13  
INVOICE #: 138242  
MATTER #: 8292

**TO:** Francis O. Scarpulla  
Zelle Hofmann Voelbel & Mason LLP  
44 Montgomery Street  
Suite 3400  
San Francisco, CA 94104  
[fscarpulla@zelle.com](mailto:fscarpulla@zelle.com)  
[jdc@coopkirk.com](mailto:jdc@coopkirk.com)

PROJECT
<i>LCD Indirect</i>
<i>April 2013 Claims Administration Services</i>

Project Database	\$	6,254.45
Project Management		11,147.25
Technical Consulting		792.65
Follow-Up Notice		1,278.83
Claim Forms Submitted (1,211 @ \$0.15 each)		181.65
Print & Mail		90.75
Website Modification		2,406.00
Document Receipting		361.26
Scanning		3,816.12
Correspondence/Admin Mail		2,165.80
Data Capture		319.38
Return Mail Processing		79.92
Claims Validation & Audits		101,268.44
Deficiency Claim Processing		6,501.53
Deficiency Notification		1,028.60
Mailroom & Data Capture Management		261.90
Call Center Scripting		140.24
Call Center Support		4,259.40
<b>SUBTOTAL</b>		<b>142,354.17</b>
Expenses: Other Charges and Out-of-Pocket Costs		
Print and Mail Notice		3,624.48
Call Center/Telecommunications		4,231.19
Postage/Federal Express		801.75
Shredding/Storage		94.00
Other/Supplies		12.50
Photocopies/Faxing/Printing		688.00
Website Hosting		275.00
<b>SUBTOTAL</b>		<b>9,726.92</b>
<b>TOTAL INVOICE</b>	\$	<b>152,081.09</b>
<b>OUTSTANDING INVOICE(s)</b>	\$	<b>71,469.45</b>
<b>TOTAL DUE</b>	\$	<b>223,550.54</b>

**PAYMENT TERMS: NET DUE UPON RECEIPT**

**WIRE INFORMATION**

ACCOUNT #: 8093434387  
ABA/ROUTING # WIRE or ACH: 111014325  
BANK: BANK OF TEXAS, DALLAS, TX 75225  
BANK CONTACT: MAYRA LANDEROS 214.987.8817  
REFERENCE: INVOICE NUMBER

**RUST**

**PAYMENT MAILING ADDRESS:**

P O BOX 142589  
DRAWER #9051  
Irving, TX 75014-2589



DATE: 05/13/13  
 INVOICE #: 138242  
 MATTER #: 8292

# STATEMENT OF ACCOUNT

Current Invoice Period: April 2013 Claims Administration Services

<b>Total Current Invoice</b>	\$ 152,081.09
------------------------------	---------------

## OUTSTANDING INVOICES:

Date	Invoice #	Amount	Payments	Balance
03/12/13	138084	71,469.45		71,469.45

<b>PREVIOUS BALANCE DUE</b>	\$ 71,469.45
-----------------------------	--------------

<b>Total Amount Due</b>	\$ 223,550.54
-------------------------	---------------

## WIRE INFORMATION

ACCOUNT #: 8093434387  
 ABA/ROUTING # WIRE or ACH: 111014325  
 BANK: BANK OF TEXAS, DALLAS, TX 75225  
 BANK CONTACT: MAYRA LANDEROS 214.987.8817  
 REFERENCE: INVOICE NUMBER

## RUST

### PAYMENT MAILING ADDRESS:

P O BOX 142589  
 DRAWER #9051  
 Irving, TX 75014-2589

## PAYMENT TERMS: NET DUE UPON RECEIPT

Inv# 138242  
 Date May 13, 2013  
 Client Number 8292

Zelle Hofmann Voelbel & Mason LLP  
 44 Montgomery Street  
 Suite 3400  
 San Francisco, CA 94104  
 fscarpulla@zelle.com  
 jdc@coopkirk.com

Re: LCD Indirect - Project Database

829202

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEES
Brant Story	BS	188.00	2.10	394.80
Brent Honeycutt	BH	188.00	0.20	37.60
Christy Gilman	CG	188.00	0.50	94.00
Cynthia Romero	CR	175.00	3.10	542.50
Greg Brown	GSB	141.00	0.80	112.80
Jacqueline Vu	JV	163.00	5.50	896.50
Juan Carlos Quiroz	JQ	175.00	3.40	595.00
Kari Mason	KM	175.00	3.20	560.00
Kevin Hartman	KH	185.00	0.50	92.50
Rebecca Zoubek	RZ	80.00	0.60	48.00
Roso Suarez	RS	185.00	9.90	1,831.50
Samuel Vasquez	SV	163.00	1.75	285.25
Shane McDonald	SM	175.00	4.00	700.00
Tracey Rolle	TR	80.00	0.80	64.00
Total Fees:				6,254.45
Total Services				6,254.45
Total Expenses				.00
Total This Matter				6,254.45

Inv# 138242  
 Date May 13, 2013  
 Client Number 8292

Re: LCD Indirect - Project Management 829206

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEES
April Hyduk	AH	192.00	17.80	3,417.60
Doreen McGinley	DM	125.00	3.40	425.00
Grisel Hernandez	GR	90.00	0.50	45.00
Heather Handahl	HM	164.00	1.00	164.00
Jose Rivera	JR	142.00	32.20	4,572.40
Justin Honse	JH	164.00	9.90	1,623.60
Robin Niemiec	RN	199.00	3.10	616.90
Roso Suarez	RS	185.00	0.90	166.50
Sylvia Nettles	SN	93.00	1.25	116.25
Total Fees:				11,147.25

Total Services 11,147.25

Total Expenses .00

Total This Matter 11,147.25



Inv# 138242  
Date May 13, 2013  
Client Number 8292

Re: LCD Indirect - Technical Consulting 829207

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Greg Brown	GSB	141.00	0.20	28.20
Hai Bui	HB	141.00	1.60	225.60
Jacqueline Vu	JV	163.00	1.25	203.75
JoAnn Calderin	JC	90.00	2.00	180.00
Lee Anderson	LA	141.00	1.10	155.10
Total Fees:				792.65

Total Services 792.65

Total Expenses .00

Total This Matter 792.65

Inv# 138242  
 Date May 13, 2013  
 Client Number 8292

Re: LCD Indirect - Follow-Up Notice 829213

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEES
Bjorn Bergh	BB	141.00	1.50	211.50
Gregory Sartor	GWS	185.00	0.10	18.50
Juan Carlos Quiroz	JQ	175.00	1.50	262.50
Lucretia Hassing	LH	121.00	0.20	24.20
Michelle Lara	ML	121.00	0.03	3.63
Roso Suarez	RS	185.00	4.10	758.50
Total Fees:				1,278.83

Total Services 1,278.83

Total Expenses .00

Total This Matter 1,278.83

Inv# 138242  
 Date May 13, 2013  
 Client Number 8292

Re: LCD Indirect - Print & Mail 829215

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEES
Lucretia Hassing	LH	121.00	0.75	90.75
Total Fees:				90.75

Total Services 90.75

Total Expenses .00

Total This Matter 90.75

Inv# 138242  
 Date May 13, 2013  
 Client Number 8292

Re: LCD Indirect - Website Modification 829223

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEs
April Hyduk	AH	192.00	1.80	345.60
Greg Brown	GSB	141.00	1.00	141.00
Jose Rivera	JR	142.00	8.20	1,164.40
Roso Suarez	RS	185.00	3.00	555.00
Venkata Gopagari	VG	200.00	1.00	200.00
Total Fees:				2,406.00

Total Services 2,406.00

Total Expenses .00

Total This Matter 2,406.00

Inv# 138242  
Date May 13, 2013  
Client Number 8292

Re: LCD Indirect - Document Receipting 829230

For Professional Services Rendered:

TIMEKEEPER			RATE	HOURS	FEEES
Processor	244	244	54.00	6.69	361.26
Total Fees:					361.26

Total Services 361.26

Total Expenses .00

Total This Matter 361.26

Inv# 138242  
 Date May 13, 2013  
 Client Number 8292

Re: LCD Indirect - Scanning 829231

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Scan Image Processor	144	54.00	7.33	395.82
Peter Hesse	PH	206.00	1.00	206.00
Roso Suarez	RS	185.00	1.70	314.50
Sammantha Malinowski	SM	54.00	53.70	2,899.80
Total Fees:				3,816.12

Total Services 3,816.12

Total Expenses .00

Total This Matter 3,816.12

Inv# 138242  
Date May 13, 2013  
Client Number 8292

Re: LCD Indirect - Correspondence/Admin Mail 829232

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Doreen McGinley	DM	125.00	14.60	1,825.00
Jose Rivera	JR	142.00	2.40	340.80
Total Fees:				2,165.80

Total Services 2,165.80

Total Expenses .00  
-----

Total This Matter 2,165.80  
-----

Inv# 138242  
 Date May 13, 2013  
 Client Number 8292

Re: LCD Indirect - Data Capture 829234

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEES
Data Capture Processor	144	54.00	1.97	106.38
Jose Rivera	JR	142.00	1.50	213.00
Total Fees:				319.38

Total Services 319.38

Total Expenses .00  
 -----

Total This Matter 319.38  
 -----



Inv# 138242  
 Date May 13, 2013  
 Client Number 8292

Re: LCD Indirect - Return Mail Processing 829235

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEES
Mailroom Processor	151144	54.00	1.48	79.92
Total Fees:				79.92

Total Services 79.92

Total Expenses .00

Total This Matter 79.92

Inv# 138242  
 Date May 13, 2013  
 Client Number 8292

Re: LCD Indirect - Claims Validation & Audits 829236

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEES
Angela Hernandez	AH	142.00	90.63	12,869.46
April Hyduk	AH	192.00	9.60	1,843.20
Doreen McGinley	DM	125.00	191.20	23,900.00
Grisel Hernandez	GR	90.00	27.00	2,430.00
JoAnn Calderin	JC	90.00	163.05	14,674.50
Jose Rivera	JR	142.00	26.60	3,777.20
Juliana Calderin	JC	54.00	47.62	2,571.48
Justin Honse	JH	164.00	11.30	1,853.20
Kenneth Rivera	KR	90.00	138.60	12,474.00
Mary Schoenherr	MS	125.00	107.80	13,475.00
Robin Weiss	RW	90.00	62.00	5,580.00
Roslyne Atilus	RA	142.00	8.00	1,136.00
Sammantha Malinowski	SM	54.00	6.60	356.40
Seth Virshup	SV	90.00	11.80	1,062.00
Sutton Link	SL	142.00	23.00	3,266.00
Total Fees:				101,268.44

Total Services 101,268.44

Total Expenses .00

Total This Matter 101,268.44

Inv# 138242  
 Date May 13, 2013  
 Client Number 8292

Re: LCD Indirect - Deficiency Claim Processing 829237

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
April Hyduk	AH	192.00	2.70	518.40
Derrick Wersal	DW	141.00	4.13	582.33
Doreen McGinley	DM	125.00	13.80	1,725.00
Jose Rivera	JR	142.00	24.50	3,479.00
Justin Honse	JH	164.00	1.20	196.80
Total Fees:				6,501.53

Total Services 6,501.53

Total Expenses .00  
 -----

Total This Matter 6,501.53  
 -----

Inv# 138242  
 Date May 13, 2013  
 Client Number 8292

Re: LCD Indirect - Deficiency Notification 829238

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
Bjorn Bergh	BB	141.00	1.05	148.05
Derrick Wersal	DW	141.00	1.00	141.00
Elizabeth Sammons	ES	121.00	0.64	77.44
Julie Zitzmann	JZ	121.00	3.71	448.91
Justin Honse	JH	164.00	1.30	213.20
Total Fees:				1,028.60

Total Services 1,028.60

Total Expenses .00  
 -----

Total This Matter 1,028.60  
 -----

Inv# 138242  
 Date May 13, 2013  
 Client Number 8292

Re: LCD Indirect - Mailroom & Data Capture Management 829239

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEES
Mailroom Processor	151144	54.00	4.85	261.90
Total Fees:				261.90

Total Services 261.90

Total Expenses .00

Total This Matter 261.90

Inv# 138242  
 Date May 13, 2013  
 Client Number 8292

Re: LCD Indirect - Call Center Scripting 829246

For Professional Services Rendered:

TIMEKEEPER			RATE	HOURS	FEES
CSR	240	240	52.00	1.22	63.44
April Hyduk		AH	192.00	0.40	76.80
Total Fees:					140.24

Total Services 140.24

Total Expenses .00  
 -----

Total This Matter 140.24  
 -----

Inv# 138242  
 Date May 13, 2013  
 Client Number 8292

Re: LCD Indirect - Call Center Support 829247

For Professional Services Rendered:

TIMEKEEPER		RATE	HOURS	FEEES
CSR	240	240 52.00	2.60	135.20
April Hyduk	AH	192.00	0.60	115.20
Doreen McGinley	DM	125.00	0.90	112.50
Jose Rivera	JR	142.00	27.30	3,876.60
Robin Niemiec	RN	199.00	0.10	19.90
Total Fees:				4,259.40

Total Services 4,259.40

Total Expenses .00

Total This Matter 4,259.40

Inv# 138242  
 Date May 13, 2013  
 Client Number 8292

Re: LCD Indirect - Expenses 829290

For Professional Services Rendered:

Expense Detail:

Reference	Date	Description	Amount
-----	----	-----	-----
Call Center/Telecommunications			
	04/29/13	Live Call Center Support; 186 Calls	2,030.00
	04/30/13	Conference Calls 396.38 Minutes	154.59
	04/30/13	IVR 2604.33 Minutes	1,093.82
	04/30/13	Long Distance 4773.2 Minutes	572.78
	04/30/13	IVR System Charge	250.00
	04/30/13	Line Maintenance Charge Schedule	130.00
		Subtotal	4,231.19
Postage/Federal Express			
141529	04/23/13	Weekly Mail Pickup	3.11
141767	04/29/13	Weekly Mail Pickup	7.31
141768	04/29/13	Weekly Mail Pickup	1.89
	04/29/13	Metered Postage ; 150 pieces	99.44
	04/30/13	Postage; 542 pieces	249.32
	04/30/13	Postage; 958 pieces	440.68
		Subtotal	801.75
Shredding/Storage			
	04/30/13	Storage and/or Shredding 35 Boxes	70.00
	04/30/13	Storage and/or Shredding 12 Boxes	24.00
		Subtotal	94.00
Other			
	04/30/13	Barcode Labels;500	12.50
		Subtotal	12.50
Photocopies/Faxing/Printing			
	04/30/13	Photocopies/Faxing/Printing ;3434	688.00
		Subtotal	688.00



Inv# 138242  
Date May 13, 2013  
Client Number 8292

Website Hosting  
04/30/13 Web Monitor & Host

Subtotal 275.00  
275.00

Total Expenses 6,102.44  
-----

Total This Matter 6,102.44  
-----